

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

BENJAMIN PAYNE ELLIS
CREDITOR

v.

PURDUE PHARMA L.P. et, al.,
DEBTORS

CHAPTER 11

CASE NO: 19-23649 (RBD)

EXCUSABLE NEGLECT
LATE CLAIMS MOTION

BE RECOGNIZED AS
BEING TIMELY

COMES NOW, BENJAMIN PAYNE ELLIS, REQUESTING

FOR CREDITORS LATE CLAIMS BE RECOGNIZED

U.S. BANKRUPTCY COURT
S.D. OF N.Y.
2021 JUN 21 P
14

AS BEING FILED TIMELY UNDER FEDERAL

RULE OF BANKRUPTCY PROCEDURE 9006(b)(1)

EXCUSABLE NEGLECT SHOULD BE APPLIED

TO CREDITOR FOR THE FOLLOWING SITUATIONS

ARE OUT OF CREDITORS CONTROL

1) THE GLOBAL PANDEMIC HAS STOPPED ALL
INTERACTIONS WITH THOSE IN THE COMMUNITY AND
LIMITED THE CREDITORS ABILITY TO COMMUNICATE
AND GATHER INFORMATION THAT WOULD NOT NORMALLY
HAVE BEEN A BARRIER IF NOT FOR THE COVID-19.

THIS REASON ALONE IS AN ACT OF GOD WHICH
IS OUT OF THE CREDITORS CONTROL.

2.) I HAVE BEEN INCARCERATED SINCE 01-01-2020

ALL ACCESS TO INFORMATION IS LIMITED AND
ALL INFORMATION THAT COMES INTO JAIL IS
CONTROLLED BY AN OFFICER. WE ARE ONLY
ALLOWED CERTAIN PUBLICATIONS, WHICH

THE JAIL MUST APPROVE OF TIME OUT OF

THE CELL IS VERY LIMITED TO NEW RESTRICTIONS

SO TIME TO SPEAK ON THE PHONE IS MINIMAL.

THE PANDEMIC HAS HALTED ALL COMMUNICATIONS

AND CONTACT WITH PEOPLE PREVENTING ME

FROM FILING ON TIME.

THE RELIEF SOUGHT HERE IS PROPER
AS THIS IS RISING OUT OF THE SOUTHERN
DISTRICT OF NEW YORK AND PURSUANT
TO 28 U.S.C. - §§ 1408 AND 1409

FOR THE REASONS AS BEFORE MENTIONED
I BEG THIS COURT FOR THE RELIEF
SOUGHT.

BENJAMIN PAYNE ELLIS
06-15-2021

Benjamin Payne Ellis

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